

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA)

v.)

Criminal No. 07-06-P-S

JASON JORDAN)

DONALD GODIN)

MICHAEL HOFFMAN)

JAMES NIEMI)

KIRK GROVER)

SCOTT BURNS)

ROYCE LAJOIE)

JOSHUA BLACK)

JAMES MICHAUD)

PAMELA BEAN)

ROMAINE LANGELIER)

MICHELLE FORTIER)

LINDA WILSON)

RYAN BOURGOIN)

**JOINT MOTION TO EXTEND DEADLINE
TO PROVIDE DISCOVERY AND FILE DISPOSTIVE MOTIONS**

NOW COMES the United States, by and through its attorneys, Paula D. Silsby, United States Attorney for the District of Maine, and Daniel J. Perry, Assistant United States Attorney, and defendants Jordan, Godin, Hoffman, Niemi, Grover, Burns, Lajoie, Black, Michaud, Bean, Langelier, Fortier, Wilson and Bougoin, by and through their below-named counsel, and hereby jointly request the court to extend the deadline for producing discovery and filing dispositive motions, for the reasons set forth below.

1. On January 18, 2007, the court entered an Order requiring the parties to meet and confer by January 23, 2007 regarding discovery and that defendants must file dispositive motions by February 1, 2007.

2. Due to the nature of the charges contained in the indictment, initial production in

this matter will include voluminous discovery. Given the volume of discoverable material, the government needs additional time to produce discovery to the sixteen defendants.

3. Given the anticipated volume of discovery, defense counsel will need additional time after the production of the discovery to review it to determine what, if any, pretrial motions should be filed.

4. Defendant Smith has not yet made an initial appearance and does not have a position on this motion.

5. Defendant Mihalakis has not, as of this date, been arrested and does not have a position on this motion.

6. Defendant Mercier already made an oral motion to continue the pretrial motions deadline to February 26, 2007, which was granted.

7. All remaining defendants, who join in this motion, have indicated through their counsel that they waive the period covered by this extension under the Speedy Trial Act.

Accordingly, the parties jointly request the deadlines to produce discovery and file dispositive motions be extended by 25 days. The deadline to produce discovery will be extended to February 12, 2007, and thereafter the defendants would be required to file their motions by February 26, 2007.

Paula D. Silsby
United States Attorney

January 23, 2007

/s/Daniel J. Perry
Assistant U.S. Attorney

January 23, 2007

/s/Scott J. Lynch
Attorney for Jason Jordan

January 23, 2007

/s/Bruce M. Merrill

	Attorney for Donald Godin
January 23, 2007	/s/William Maselli Attorney for Michael Hoffman
January 23, 2007	/s/J. Hilary Billings Attorney for James Niemi
January 23, 2007	/s/Neale A. Duffett Attorney for Kirk Grover
January 23, 2007	/s/Roger F. Brunelle Jr. Attorney for Scott Burns
January 23, 2007	/s/Gail M. Latouf Attorney for Royce Lajoie
January 23, 2007	/s/Henry W. Griffin Attorney for Joshua Black
January 23, 2007	/s/Richard L. Hartley Attorney for James Michaud
January 23, 2007	/s/Thomas A. Dyhrberg Attorney for Pamela Bean
January 23, 2007	/s/Peter E. Rodway Attorney for Romaine Langelier
January 23, 2007	/s/Neal K. Stillman Attorney for Michelle Fortier
January 23, 2007	/s/Robert J. Ruffner Attorney for Linda Wilson
January 23, 2007	/s/Mary A. Davis Attorney for Ryan Bourgoin